

1 John P. Aldrich, Esq.
2 Nevada Bar No. 6877
3 Catherine Hernandez, Esq.
4 Nevada Bar No. 8410
5 **ALDRICH LAW FIRM, LTD.**
6 7866 West Sahara Avenue
7 Las Vegas, NV 89117
8 Tel (702) 853-5490
9 Fax (702) 227-1975
10 *Attorneys for Plaintiff*

11
12 **UNITED STATES DISTRICT COURT**
13 **DISTRICT OF NEVADA**

14 SCOTT ALLAN,
15
16 Plaintiff,

17 vs.

18 PROGRESSIVE NORTHERN INSURANCE
19 COMPANY,
20 Defendant.

Case No.: 2:22-cv-01424-GMN-EJY

21 **STIPULATION AND ORDER TO**
22 **EXTEND TIME FOR PLAINTIFF TO**
23 **RESPOND TO DEFENDANT'S**
24 **MOTION FOR PARTIAL SUMMARY**
25 **JUDGMENT [ECF #62]**

26 *(First Request)*

27 Plaintiff SCOTT ALLAN and Defendant PROGRESSIVE NORTHERN INSURANCE
28 COMPANY, through their respective counsel, stipulate and agree as follows:

- 29 1. On December 27, 2024, Defendant filed a Motion for Partial Summary Judgment
30 ("Motion") [ECF #62]. Plaintiff's Response to the Motion is currently due on January
31 17, 2025.
- 32 2. The mediation in this matter is currently scheduled for January 27, 2025 (having
33 recently been postponed from January 9, 2025 due to the National Day of Mourning
34 following the death of former President Jimmy Carter). Additionally, Plaintiff's
35 counsel has a wedding in his immediate family the week of the current deadline for the
36 Response to the Motion.
- 37 3. The parties stipulate that Plaintiff shall have until ten days after the mediation, until
38 February 6, 2025, to file a Response to the Motion.

1 This Stipulation is submitted in good faith and is not interposed for purposes of delay. This
2 is the first request to extend the deadline for Plaintiff to respond to Defendant's Motion for Partial
3 Summary Judgment.

4 DATED this 9th day of January, 2025.

DATED this 9th day of January, 2025.

5 **ALDRICH LAW FIRM, LTD.**

BARRON & PRUITT, LLP


6 /s/ John P. Aldrich
7 John P. Aldrich, Esq.
8 Nevada Bar No. 6877
9 7866 West Sahara Avenue
10 Las Vegas, NV 89117
11 Telephone: (702) 853-5490
12 jaldrich@johnaldrichlawfirm.com
13 *Attorney for Plaintiff*

/s/ William H. Pruitt
William H. Pruitt, Esq.
Nevada Bar No. 6783
3890 West Ann Road
North Las Vegas, Nevada 89031
Telephone: (702) 870-3940
bpruitt@lvnlaw.com
Attorneys for Defendant

14 **ORDER**

15 IT IS SO ORDERED.

16 Dated: January 10, 2025.

17 
18 _____
19 Gloria M. Navarro
20 UNITED STATES DISTRICT JUDGE
21
22
23
24
25
26
27
28